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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMES E. "DOC" JENSEN, JR.,

Defendant.

**Case No. CR-18-155-BLG-DLC**

**UNOPPOSED MOTION TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO GOVERNMENT'S  
SENTENCING MEMORANDUM**

COMES NOW Defendant JAMES E. JENSEN, JR., by and through his counsel of record, the FEDERAL DEFENDERS OF MONTANA and STEVEN C. BABCOCK, Assistant Federal Defender, and moves the Court for an order continuing the deadline to file the response to the Government's Sentencing Memorandum currently scheduled for July 24, 2019. It is respectfully requested that this Honorable Court continue the deadline date from July 24, 2019 to July 26, 2019.

The Government filed a sentencing memorandum on July 19, 2019. The Government is requesting that this Court vary from the advisory guideline range of 78-97 months and impose a sentence 180 months. The requested sentence is the statutory maximum. PSR ¶98.

Mr. Jensen is currently incarcerated in Shelby, MT. The undersigned needs to see Mr. Jensen before filing a response to the Government's Sentencing Memorandum. Travel plans were made for the undersigned to see Mr. Jensen in Shelby on July 23, 2019. On July 19, 2019, the undersigned was informed that Mr. Jensen could not be seen until July 24, 2019, the day that the response is due. The undersigned needs more time to address the relevant sentencing issues with Mr. Jensen and then file the response. It is respectfully requested that an extension to file a Response to the Government's Sentencing Memorandum be granted until July 26, 2019.

Bryan T. Dake, Assistant United States Attorney, has been contacted and does not object to said motion.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of July, 2019.

/s/ Steven C. Babcock  
STEVEN C. BABCOCK  
Federal Defenders of Montana  
Counsel for Defendant

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on July 23, 2019, a copy of the foregoing document was served on the following persons by the following means:

<u>1, 2</u>	CM-ECF
<u>          </u>	Hand Delivery
<u>3</u>	Mail
<u>          </u>	Overnight Delivery Service
<u>          </u>	Fax
<u>          </u>	E-Mail

1. CLERK, UNITED STATES DISTRICT COURT

2. ZENO B. BAUCUS  
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Counsel for the United States

3. JAMES E. JENSEN, JR.  
Defendant

/s/ Steven C. Babcock  
STEVEN C. BABCOCK  
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Counsel for Defendant